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Attorneys for
TIGER NATURAL GAS, INC.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
- ☒ Affects Pacific Gas and Electric Company
- ☐ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

CASE NO. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF LEAH E.
CAPRITTA IN SUPPORT OF TIGER
NATURAL GAS INC.'S MOTION TO
FILE CERTAIN DOCUMENTS UNDER
SEAL PURSUANT TO 11 U.S.C. §§ 105(a)
AND 107(b) AND FRBP 9018**

Date: November 13, 2019
Time: 10:00 AM (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection

Deadline: November 8, 2019
4:00 p.m. (Pacific Time)

DECLARATION OF LEAH E. CAPRITTA

I, Leah E. Capritta, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated herein. I am an attorney at law licensed to practice in the State of Colorado and admitted pro hac vice to practice before this Court. I am a partner at the law firm of Holland & Knight LLP and am counsel for Tiger Natural Gas, Inc. ("Tiger"). I make this declaration in support of Tiger's Motion to File Certain Documents Under Seal. I have personal knowledge of the facts set forth below, and if called and sworn as a witness, I could and would testify competently thereto.

2. Filed contemporaneously with Tiger's Reply in Support of Motion for Relief from Automatic Stay is my declaration that all exhibits referenced in the Motion to File Certain Documents Under Seal are true and correct copies.

3. Per the District Court's Protective Order in *Tiger Natural Gas, Inc. v. Pacific Gas and Electric Company, et al.*, Case No. 4:16-CV-06711 (JSW) [Dkt. #64], "Protected Material" includes "Confidential" or "Attorney's Eyes Only" material. The Protective Order limits the public disclosure of such material and provides: "Without written permission from the Designating Party or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record in this action any Protected Material. A Party that seeks to file under seal any Protected Material must comply with Civil Local Rule 79-5." The documents listed below are therefore sealable as they have been designated "Attorney's Eyes Only" by PG&E and said documents have been filed under seal contemporaneously herewith.

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- Relevant excerpts of the Deposition Transcript of Michael Quinn, Ph.D., dated September 29, 2017; and
- Relevant excerpts of the Deposition Transcript of Daniel W. Ray, dated October 4, 2017.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: November 11, 2019

HOLLAND & KNIGHT LLP

By: /s/ Leah E. Capritta
Leah E. Capritta

Attorneys for Tiger Natural Gas, Inc.